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Dear USDA,

As it now stands and after reading Bill Miller's article (see article), I am & we are opposed to "Country of Origin labeling." Bill's article efficiently explains why the livestock industry would have opposition. COOL does not look or sound cool given all the facts for consideration!

Until reworked entirely, USDA would do well to put COOL on the shelf. Thank you.

Respectfully,
Bryan & Carolyn Simms

From Carolyn Simms 785-361-2472

HORIZONS

Why is poultry exempt from this??

This is not COOL!

■ Hats off to members of the Texas Cattle Feeders Association's (TCFA) market committee. In late November, the group publicly recommended that the mandatory Country of Origin Labeling (COOL) law be rescinded. The recommendation is not yet official TCFA policy and may not ever be granted that status, but at least there are some producers who are evaluating this law and calling a spade a spade.

The industry has until April 8, 2003 to file comments with USDA on COOL. At this time, few beef producers' organizations have publicly taken a position similar to that of TCFA's market committee. However, if beef producer organizations were really looking out for their members' best interests, they'd be in Washington every day making sure Congress understands this legislation will only hurt the very people it was supposedly created to help.

Does it remind you of mandatory price reporting? It's déjà vu all over again. Economics should drive what happens on issues like COOL but, unfortunately, industry politics too often derail, or at least temporarily prevent, economic reality from being exposed before damage is done.

In late November, USDA's Agricultural Marketing Service released its analysis of COOL's cost. At \$2 billion in the first year, the analysis was, arguably, not nearly inclusive of all costs to our industry. But it did raise red flags high enough that some folks in Texas and around the country saw them. As a result, more individuals are beginning to speak out about the

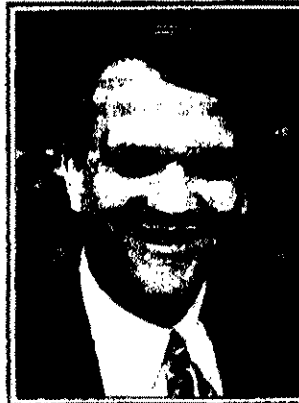
very significant negative impact COOL will have on the U.S. beef industry and consumers who buy our products. Taken to its extreme, out-of-pocket cash cost may be less significant than other impacts COOL could drop on beef producers.

Addressing the Farm Journal Forum in early December, John Tyson, chairman and CEO of Tyson Foods, Inc., identified some of the consequences and costs of mandatory COOL, which is scheduled to start in September 2004.

Are you ready for mandatory ID? With COOL, it may be as mandatory as the COOL law itself. Along with identification, you'll need documentation for each animal that includes where it was born and raised—from the pristine ranch, to the sale barn, to the stocker operator, to the feedlot.

Tyson told the forum participants that his company is already hearing from retail customers who, beginning in September 2004, are going to require his company to provide

extensive documentation and independent certification to meet the COOL requirements. In order for that to happen, cattle and hog producers will have to comply—providing biographical information on their livestock to the processor. "Because come September 2004, if the 'born in' and 'raised in' documentation is not adequate, their livestock will not be saleable for the U.S. retail food trade," Tyson pointed out. Now that will be a marketing problem! Fonny



thing, I never heard any of the proponents of COOL mention that.

Of the \$2 billion, first-year price tag, half will be borne by producers for the aforementioned record-keeping system. Companies who process and market beef for the U.S. consumer market will pay the balance to

develop and maintain systems to track product. These costs only cover record keeping. Other costs, such as animal identification, beef product segregation and retail labeling, are not included in the initial cost estimate. They will be substantial—perhaps significantly more than the initial-year cost projection on a recurring annual basis. Producers and, to a certain extent, consumers will pay the bill—putting beef at a disadvantage to poultry, which is somehow exempt from COOL.

How did that happen? Perhaps a more important question is, how did COOL happen? Just like mandatory price reporting—well intentioned, but poorly informed people won the battle of influencing legislators. We have until early April to let USDA know what we think about such an onerous law. If we don't speak now, I have a feeling we're going to wish we had when voluntary COOL becomes mandatory in 2004.

Bill Miller, communications director for U.S. Premium Beef, has written "Horizons" for BEEF TODAY since 1987. Call his Council Grove, Kan., ranch at (620) 767-7041.

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